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Attorneys for Defendant,  
Ann Hilton

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
ANN HILTON,  
Defendant.

2:11-cr-00430-RCJ-GWF

**STIPULATION TO CONTINUE  
TRIAL DATES**

### (Third Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Daniel Schiess, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Richard F. Boulware, Assistant Federal Public Defender, counsel for ANN HILTON, that the trial currently scheduled for October 30, 2012 at 8:30 a.m., be vacated and set to a Change of Plea hearing on November 9, 2012 or as soon as practicable there after.

This Stipulation is entered into for the following reasons:

1. There is now a signed plea agreement in this case. The continuance is requested to allow for the setting of the change of plea hearing for Ms. Hilton and to allow sufficient time for her to be able make reasonable arrangements to travel to Las Vegas for this hearing.
  2. The defendant is not incarcerated and does not object to the continuance.
  3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the defendant sufficient time to effectively confer with counsel about the details and consequences of entering a plea in this case.

5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

This is the third request for a continuance filed herein.

DATED this 11th day of October, 2012.

RENE L. VALLADARES  
Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

By: RICHARD F. BOULWARE,  
Assistant Federal Public Defender  
Counsel for Ann Hilton

/s/ Daniel Schiess  
By: DANIEL SCHIESS,  
Assistant United States Attorney  
Counsel for Plaintiff

/s/ Ann Hilton  
By: \_\_\_\_\_  
ANN HILTON  
Defendant

1           4. The additional time requested herein is not sought for purposes of delay, but  
2 merely to allow counsel for the defendant sufficient time to effectively confer with counsel about the  
3 details and consequences of entering a plea in this case.

4           5. The additional time requested by this Stipulation is excludable in computing  
5 the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,  
6 United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Section 3161(h)(7)(A),  
7 considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and  
8 3161(h)(7)(B)(iv).

9           This is the third request for a continuance filed herein.

10           DATED this 11th day of October, 2012.

11           RENE L. VALLADARES  
12           Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

13  
14           By: RICHARD F. HOULWARE,  
15           Assistant Federal Public Defender  
16           Counsel for Ann Hilton

17  
18           By: DANIEL SCHIESS,  
19           Assistant United States Attorney  
20           Counsel for Plaintiff

21  
22           By: Ann Hilton  
23           ANN HILTON  
24           Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,

2:11-cr-00430-RCJ-GWF

**Plaintiff,**

vs.

ANN HILTON,

**Defendant.**

## **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

## FINDINGS OF FACTS

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. There is now a signed plea agreement in this case. The continuance is requested to allow for the setting of the change of plea hearing for Ms. Hilton and to allow sufficient time for her to be able make reasonable arrangements to travel to Las Vegas for this hearing.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but

merely to allow counsel for the defendant sufficient time to effectively confer with counsel about the details and consequences of entering a plea in this case.

5. The additional time requested by this Stipulation is excludable in computing

the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,

United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Section 3161(h)(7)(A),

considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and

3161(h)(7)(B)(iv).

## **CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, title 18, United States Code, Section 3161(h)(1)(A), 3161(h)(7) and Title 18 United States Code, Section 3161 (h)(7)(A), when the considering the facts under Title 18, United States Code, Section 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

## ORDER

12 IT IS THEREFORE that the trial currently scheduled for October 30, 2012 at 8:30  
13 a.m., be **vacated**; and the Change of Plea hearing be set for November 9, 2012 at 9:30 am.

DATED this 11th day of October, 2012.

  
F. Jones  
UNITED STATES DISTRICT JUDGE